

**Presentment Date and Time: June 27, 2024 at 4:00 PM (ET)**  
**Objection Deadline: June 26, 2024 at 4:00 PM (ET)**

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and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF FILING OF STIPULATION AND ORDER BY AND AMONG THE  
DEBTORS AND THE AD HOC GROUP OF GENESIS LENDERS REGARDING  
REMAINING COMPONENTS OF THE AD HOC GROUP MASTER CLAIM**

**PLEASE TAKE NOTICE** that, on January 19, 2023 (the “Petition Date”), Genesis Global Holdco, LLC (“Holdco”) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that, on June 20, 2024, the Debtors filed the *Stipulation and Order by and Among the Debtors and the Ad Hoc Group of Genesis Lenders Regarding Remaining Components of the Ad Hoc Group Master Claim* (the “Stipulation and Order”), attached hereto as Exhibit A. The Stipulation and Order will be presented for signature

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich St., 38<sup>th</sup> Floor, New York, NY 10007.

to the Honorable Sean H. Lane, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601 on **June 27, 2024 at 4:00 PM (Eastern Time)** (the “Presentment Date”).

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Stipulation and Order or the relief requested therein shall be made in writing and (a) filed with the Bankruptcy Court no later than **June 26, 2024 at 4:00 PM (Eastern Time)** (the “Objection Deadline”) and (b) served as required by the *Order Implementing Certain Notice and Case Management Procedures*, ECF No. 44 (the “Case Management Order”).

**PLEASE TAKE FURTHER NOTICE** that, if no written objections are timely filed and served with respect to the Stipulation and Order, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form annexed as Exhibit A to the Stipulation and Order, which order the Bankruptcy Court may enter without further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that, if a written objection is timely filed and served by the Objection Deadline, the Debtors shall notice a hearing (the “Hearing”) with respect to the Stipulation and Order, which shall be held via Zoom and attended by the Debtors, the Ad Hoc Group of Genesis Lenders, and any objecting parties. Failure to attend the Hearing may result in entry of the Stipulation and Order without further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that copies of the Stipulation and Order can be viewed and/or obtained by: (i) accessing the Bankruptcy Court’s website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (PACER password required) or (ii) from the Debtors’ proposed notice and claims agent, Kroll Restructuring Administration LLC, which maintains a website at <https://restructuring.ra.kroll.com/genesis> or by calling +1 888 524 2017.

Dated: June 20, 2024  
New York, New York

/s/ Luke A. Barefoot  
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Luke A. Barefoot  
Jane VanLare  
Thomas S. Kessler  
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*Counsel to the Debtors  
and Debtors-in-Possession*

**EXHIBIT A**

**Stipulation and Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**STIPULATION AND ORDER BY AND AMONG THE DEBTORS  
AND THE AD HOC GROUP OF GENESIS LENDERS REGARDING  
REMAINING COMPONENTS OF THE AD HOC GROUP MASTER CLAIM**

This Stipulation and Order (the “Stipulation and Order”) is entered into on the date hereof, by and among Genesis Global Holdco, LLC (“Holdco”) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) and the Ad Hoc Group of Genesis Lenders (the “Ad Hoc Group” and together with the Debtors, the “Parties”).

**Recitals**

A. On January 19, 2023, each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) (the date of such filing, the “Petition Date”). The Debtors are operating their businesses as debtors-in-possession under sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors’ Chapter 11 Cases have been consolidated for procedural purposes only and are jointly administered pursuant to Bankruptcy Rule 1015(b) (ECF No. 37). No trustee or examiner has been appointed in the Chapter 11 Cases. An official committee of unsecured creditors (the “Committee”) was appointed in these Chapter 11 Cases on February 3, 2023 (ECF No. 55), as amended on April 18, 2024 (ECF No. 1595).

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich St., 38<sup>th</sup> Floor, New York, NY 10007.

B. Prior to the Petition Date, Genesis Global Capital, LLC (“GGC”) entered into separate master loan agreements (the “MLAs”) with each of the members of the Ad Hoc Group (collectively, the “Members”), which governed the terms of fiat and digital asset loans to be issued by the Members to GGC. The terms of each loan were customarily delineated in loan term sheets, a form of which was attached to the MLAs.

C. On April 4, 2023, the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) entered its *Order (I) Establishing Bar Dates for Submitting Proofs of Claim, (II) Approving Proof of Claim Form, Bar Date Notices, and Mailing and Publication Procedures, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims, and (IV) Providing Certain Supplemental Relief* (ECF No. 200) (the “Bar Date Order”), which established May 22, 2023 as the general date by which most creditors must have submitted their proofs of claim (the “General Bar Date”).

D. The Bar Date Order, among other things, authorized and directed the Ad Hoc Group to file a single proof of claim pursuant to section 501(a) of the Bankruptcy Code on account of prepetition claims against the Debtors held by Members pursuant to the relevant MLAs and/or term sheets. Bar Date Order ¶ 9. The Ad Hoc Group timely filed two (2) such Ad Hoc Group Master Claims. *See* Claim Nos. 447 and 489. Claim No. 447 was subsequently amended by Claim No. 831, and Claim No. 489 was subsequently withdrawn. Claim No. 831 is heretofore referred to as the “Ad Hoc Group Master Claim.”

E. Each Member is included as part of the Ad Hoc Group Master Claim, and asserts liabilities against GGC arising under the applicable MLA(s) or loan term sheets.

F. On February 26, 2024, the Debtors filed the *Debtors' Amended Joint Chapter 11 Plan* (ECF No. 1392, as may be revised, amended or modified from time to time, the “Plan”).<sup>2</sup> On May 17, 2024, the Bankruptcy Court issued its *Memorandum of Decision* with respect to confirmation of the Plan and the objections thereto (ECF No. 1691).

G. On May 31, 2024, the Bankruptcy Court entered its *Findings of Fact, Conclusions of Law, and Order (I) Confirming the Debtors' Amended Joint Chapter 11 Plan and (II) Granting Related Relief* (ECF No. 1736) (the “Confirmation Order”), confirming the Plan in the form attached thereto as Exhibit 1.

H. Since the filing of the Ad Hoc Group Master Claim, (a) certain Members have resigned from the Ad Hoc Group (the “Resigned Members”) and (b) the Parties have engaged in extensive good faith discussions concerning the reconciliation of the Ad Hoc Group Master Claim and each of the components thereof with respect to the remaining Members (the “Remaining Members”) and their subject Claims (the “Subject Claims”). To fully resolve the issues discussed concerning the Subject Claims, and to avoid unnecessary motion practice, the Parties have agreed to enter into and now jointly submit this Stipulation and Order.

**IT IS THEREFORE STIPULATED AND AGREED, AND UPON BANKRUPTCY COURT APPROVAL HEREOF, IT IS HEREBY ORDERED that:**

1. The above recitals are incorporated herein in their entirety.
2. Upon the Bankruptcy Court's entry of this Stipulation and Order, the Ad Hoc Group Master Claim shall be allowed solely with respect to the Subject Claims in the denominations and amounts set forth in Exhibit 1 to this Stipulation and Order (the “Allowed Claims”) as general unsecured prepetition claims against GGC, which Allowed Claims shall be (a) without any further

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

offset or deduction of any kind and (b) exclusive of any interest which has accrued from and after the Petition Date, and which interest, if any, shall be paid in accordance with the terms of the Plan (including the Distribution Principles) and the Bankruptcy Court's determination on entitlement and amounts thereof. Any distributions on the Allowed Claims shall be governed by, and subject to, the Plan and the Distribution Principles.

3. For the avoidance of doubt, no portion of the Ad Hoc Group Master Claim other than the Allowed Claims is affected by this Stipulation and Order.

4. The Debtors (including the Wind-Down Debtors) explicitly reserve all of their rights and defenses with respect to the components of the Ad Hoc Group Master Claim set forth on Exhibit 2 hereto, which relate to Resigned Members (the "Excluded Claims"), including, without limitation, the right to object to the Excluded Claims at a later date on any and all grounds; *provided, however*, that the Debtors (including the Wind-Down Debtors) shall have no such rights with respect to components of the Ad Hoc Group Master Claim previously allowed herein or by separate stipulation and order of the Bankruptcy Court.

5. Nothing in this Stipulation and Order shall prejudice the Remaining Members' rights, remedies and claims against any non-Debtor, as to which all non-Debtors reserve all of their respective rights and defenses.

6. This Stipulation and Order shall be binding upon and inure to the benefit of the Debtors, their estates, the Remaining Members, and the Ad Hoc Group acting on behalf of the Remaining Members, as well as their respective heirs, representatives, predecessors, successors and assigns, as the case may be. This Stipulation and Order shall be binding on the Committee, and any trustee or examiner appointed in the Debtors' Chapter 11 Cases and on all other creditors and parties in interest in the Debtors' Chapter 11 Cases. This Stipulation and Order shall remain

binding on the Debtors' estates and any chapter 7 trustee in the event that the Debtors' Chapter 11 Cases are converted to chapter 7 cases.

7. Nothing in this Stipulation and Order shall in any way be construed as or deemed to be evidence of or reflect an admission on behalf of any of the Parties to this Stipulation and Order regarding any claim or right that such Party may have against any other Party to this Stipulation and Order, except with respect to the Allowed Claims, which shall be subject to the provisions of this Stipulation and Order.

8. The Parties drafted this Stipulation and Order through a cooperative effort, and no Party shall be considered the drafter of this Stipulation and Order so as to give rise to any presumption regarding construction of this Stipulation and Order.

9. This Stipulation and Order may be signed in counterpart originals and delivered by facsimile or email, which, when fully executed, shall constitute a single original. A facsimile or email signature delivered by portable data format (.pdf) shall be deemed an original.

10. This Stipulation and Order contains the entire agreement between the Parties with respect to the subject matter hereof, and may only be modified in writing, signed by the Parties or their duly appointed agents.

11. Each of the undersigned Parties represents that he or she (i) is authorized to execute and be bound by this Stipulation and Order on behalf of themselves or their client (or, in the case of the Ad Hoc Group, Remaining Member or such other parties from which the Ad Hoc Group has obtained authorization), and (ii) has full knowledge of and has consented to the terms of this Stipulation and Order.

12. For the avoidance of doubt, nothing herein shall constitute an assumption of any contract or agreement between the Parties. This Stipulation and Order shall be governed by and



construed under the laws of the State of New York, without regard to conflicts of laws principles that would require the application of the law of another jurisdiction.

13. The Bankruptcy Court shall retain exclusive jurisdiction with respect to any matters, claims, rights or disputes arising from or related to this Stipulation and Order or any other actions to implement, interpret or enforce the terms and provisions of this Stipulation and Order.

14. The Debtors' claims agent, Kroll Restructuring Administration, and the Clerk of the Bankruptcy Court are authorized to take any and all actions necessary and appropriate to give effect to this Stipulation and Order, including updating the Claims Register to reflect the relief granted herein.

15. This Stipulation and Order is subject to the approval of the Bankruptcy Court and shall be of no force and effect unless and until such approval is obtained. This Stipulation and Order shall be effective immediately upon approval by the Bankruptcy Court, notwithstanding the applicability of any Federal Rule of Bankruptcy Procedure.

*[Remainder of page left intentionally blank]*

Stipulated and agreed to by:

Dated: June 20, 2024  
New York, New York

**CLEARY GOTTlieb STEEN &  
HAMILTON LLP**

By: /s/ Luke A. Barefoot  
Sean A. O'Neal  
Luke A. Barefoot  
Jane VanLare  
Thomas S. Kessler  
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-and-

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*Counsel to the Ad Hoc Group of  
Genesis Lenders on Behalf of the Remaining  
Members*

**SO ORDERED**

Dated: June \_\_\_\_\_, 2024  
White Plains, New York

\_\_\_\_\_  
THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

Allowed Claims

<b>NAME</b>	<b>NATURE AND AMOUNT OF ASSERTED CLAIM</b>	<b>NATURE OF SECURITY INTERESTS, IF ANY</b>
<b>Anonymous Lender 2</b>	<ul style="list-style-type: none"> <li>• 340.04794775 BTC</li> <li>• 342.4210573 Binance Coin (BNB)</li> <li>• \$51,913,681.22 USD</li> <li>• 8,171,412.04 USD Coin (USDC)</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 3</b>	<ul style="list-style-type: none"> <li>• \$508,811.14</li> <li>• 100.99438962 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 4</b>	<ul style="list-style-type: none"> <li>• 10.90830277 BTC</li> <li>• 72.676826541067 ETH</li> <li>• 72.708942941973 ETHW</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 5</b>	<ul style="list-style-type: none"> <li>• 1,010.49672093 BTC</li> <li>• \$11,630,922.79 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 6</b>	<ul style="list-style-type: none"> <li>• \$314,508.29 USD</li> <li>• 102,193.35 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 7</b>	<ul style="list-style-type: none"> <li>• \$1,273,504.25 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 8</b>	<ul style="list-style-type: none"> <li>• 27.72013163 BTC</li> <li>• 50.26311216 Ethereum (ETH)</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 9</b>	<ul style="list-style-type: none"> <li>• 1,166.645016781770 ETH</li> <li>• 1,156.508520 Ethereum PoW (ETHW)</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 10</b>	<ul style="list-style-type: none"> <li>• \$10,482,457.41 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 12</b>	<ul style="list-style-type: none"> <li>• 177.02442984 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 13</b>	<ul style="list-style-type: none"> <li>• 3,572.46 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 14</b>	<ul style="list-style-type: none"> <li>• 35.34814057 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>

<b>Anonymous Lender 15</b>	<ul style="list-style-type: none"> <li>• 20,378,186.57 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 16</b>	<ul style="list-style-type: none"> <li>• 228.44527 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 18</b>	<ul style="list-style-type: none"> <li>• 83.50 BTC</li> <li>• \$20,335,768.72</li> <li>• 30,569,806.37 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 19</b>	<ul style="list-style-type: none"> <li>• 303.54910988 BTC</li> <li>• 2,046,442.14 USDC</li> <li>• 1,011.66251534 ETH</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 20</b>	<ul style="list-style-type: none"> <li>• 103.49765216 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 21</b>	<ul style="list-style-type: none"> <li>• 24.12 BTC</li> <li>• \$777,527.26</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 22</b>	<ul style="list-style-type: none"> <li>• 1,686.5687797 BTC</li> <li>• 6,067.51555312 ETH</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 23</b>	<ul style="list-style-type: none"> <li>• \$3,291,852.41 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 24</b>	<ul style="list-style-type: none"> <li>• 836,181.68 GLMR</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 25</b>	<ul style="list-style-type: none"> <li>• 839,807.02 GLMR</li> <li>• 377,708.4734 FLOW</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 26</b>	<ul style="list-style-type: none"> <li>• 4,470,711.30 Tether (USDT)</li> <li>• 3,065.0237 ETH</li> <li>• 265.2445 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 27</b>	<ul style="list-style-type: none"> <li>• 40.45142619 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 28</b>	<ul style="list-style-type: none"> <li>• 313.1 BTC</li> <li>• 17,576.5 ETHW</li> <li>• 17,570.5 ETH</li> <li>• \$266,641.17 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Claim modified to account for setoff of borrowed amounts and collateral provided therefor</li> </ul>

<b>Anonymous Lender 29</b>	<ul style="list-style-type: none"> <li>• 906.32606182 BTC</li> <li>• 607.310520744257 ETH</li> <li>• 1,511.63626227 Bitcoin Cash (BCH)</li> <li>• 2,116.29088715 Bitcoin SV (BSV)</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 30</b>	<ul style="list-style-type: none"> <li>• 161.66700827 BTC</li> <li>• 1,214.4971797684 ETH</li> <li>• \$5,100,483.17 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 31</b>	<ul style="list-style-type: none"> <li>• 103.24798769 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 32</b>	<ul style="list-style-type: none"> <li>• 5,148,412.35 USDT</li> <li>• \$1,262,592.26 USDC</li> <li>• 2,513,236.64 MANA</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 33</b>	<ul style="list-style-type: none"> <li>• \$79,727,019.50 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 34</b>	<ul style="list-style-type: none"> <li>• 3,957,068.86 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 35</b>	<ul style="list-style-type: none"> <li>• \$6,107,626.94 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 36</b>	<ul style="list-style-type: none"> <li>• \$1,450,230.05 USD</li> <li>• 4,037.36 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 37</b>	<ul style="list-style-type: none"> <li>• 203.20172414 BTC</li> <li>• 304.494447843154 ETH</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 38</b>	<ul style="list-style-type: none"> <li>• 41.57301286 BTC</li> <li>• 258.150573440055 ETH</li> <li>• 94.528240283807 ETHW</li> <li>• \$1,023,980.17</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 39</b>	<ul style="list-style-type: none"> <li>• 33.89238164 BTC</li> <li>• 95.626662156675 ETH</li> <li>• 94.543979966958 ETHW</li> <li>• \$43,019.63 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 40</b>	<ul style="list-style-type: none"> <li>• 26.11432238 BTC</li> <li>• 103.359371583053 ETH</li> <li>• 102.716047627467 ETHW</li> <li>• \$287,074.03 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 41</b>	<ul style="list-style-type: none"> <li>• \$47,846.96 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>

<b>Anonymous Lender 42</b>	<ul style="list-style-type: none"> <li>• 34,644,063.77 USDT</li> <li>• \$15,290,461.54 USD</li> <li>• 6,207,483.25 USDC</li> </ul>	• Unsecured
<b>Anonymous Lender 43</b>	<ul style="list-style-type: none"> <li>• \$3,056,109.00 USD</li> </ul>	• Unsecured
<b>Anonymous Lender 45</b>	<ul style="list-style-type: none"> <li>• 50.71653743 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 46</b>	<ul style="list-style-type: none"> <li>• 12.11 BTC</li> <li>• 394.16 ETH</li> </ul>	• Unsecured
<b>Anonymous Lender 47</b>	<ul style="list-style-type: none"> <li>• \$1,100,685.60 USD</li> <li>• 513,321.63 USDC</li> <li>• 105.04113 BTC</li> <li>• 1,083.24272 ETH</li> </ul>	• Unsecured
<b>Anonymous Lender 48</b>	<ul style="list-style-type: none"> <li>• 213.50527206 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 49</b>	<ul style="list-style-type: none"> <li>• \$11,510,888.02 USD</li> </ul>	• Unsecured
<b>Anonymous Lender 50</b>	<ul style="list-style-type: none"> <li>• \$2,379,980.65</li> </ul>	• Unsecured
<b>Anonymous Lender 51</b>	<ul style="list-style-type: none"> <li>• 104.37693616 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 52</b>	<ul style="list-style-type: none"> <li>• 241.30845788 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 55</b>	<ul style="list-style-type: none"> <li>• 101.42551868 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 56</b>	<ul style="list-style-type: none"> <li>• 377.96694666 BTC</li> <li>• 460.881078899003 ETH</li> <li>• \$33,094.50 USD</li> </ul>	• Unsecured
<b>Anonymous Lender 57</b>	<ul style="list-style-type: none"> <li>• 807.73715599 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 58</b>	<ul style="list-style-type: none"> <li>• 110.13614143 BTC</li> </ul>	• Unsecured
<b>Anonymous Lender 59</b>	<ul style="list-style-type: none"> <li>• 106.33210599 BTC</li> </ul>	• Unsecured

<b>Anonymous Lender 60</b>	<ul style="list-style-type: none"> <li>• 33.37959035 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 61</b>	<ul style="list-style-type: none"> <li>• 7.12108533 BTC</li> <li>• 1,148.532832970240 ETH</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 62</b>	<ul style="list-style-type: none"> <li>• 25.26121027 BTC</li> <li>• \$204,179.04 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 63</b>	<ul style="list-style-type: none"> <li>• \$865,780.54 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 64</b>	<ul style="list-style-type: none"> <li>• \$1,014,597.14 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 65</b>	<ul style="list-style-type: none"> <li>• 1,012.3764 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 66</b>	<ul style="list-style-type: none"> <li>• 3,094,516.29 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 67</b>	<ul style="list-style-type: none"> <li>• \$6,640,799.80 USD</li> <li>• 20,282.273580211800 ETH</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 68</b>	<ul style="list-style-type: none"> <li>• 1,923,104.44 USDT</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 70</b>	<ul style="list-style-type: none"> <li>• \$42,018,926.86 USD</li> <li>• 50,675,215.14 USDC</li> <li>• 15,227.30 ETH</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 71</b>	<ul style="list-style-type: none"> <li>• \$1,533,987.15 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 72</b>	<ul style="list-style-type: none"> <li>• 2,048,656.29 USDC</li> <li>• 8,879.66 ETH</li> <li>• 11,915.88 ETHW</li> <li>• \$11,489,133.16 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 73</b>	<ul style="list-style-type: none"> <li>• 739.4682888192 BTC</li> <li>• \$4,465,253.79 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 74</b>	<ul style="list-style-type: none"> <li>• 252.48660190 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 75</b>	<ul style="list-style-type: none"> <li>• \$10,360,636.98 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>

<b>Anonymous Lender 76</b>	<ul style="list-style-type: none"> <li>• 40.45703810 BTC</li> <li>• 409,315.15 USDC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 77</b>	<ul style="list-style-type: none"> <li>• 50.52472356 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 78</b>	<ul style="list-style-type: none"> <li>• 1,424.82661 BTC</li> <li>• 9,996.1843194 ETH</li> <li>• 23,143.950124 BCH</li> <li>• 55,198,695.7891 Stellar (XLM)</li> <li>• 33,289.6718 Chainlink (LINK)</li> <li>• 4,789.5253 Uniswap (UNI)</li> <li>• 248.6041124 AAVE</li> <li>• 26.342002 Compound (COMP)</li> <li>• 4,552.10359 Solana (SOL)</li> <li>• 2,317,807.14 USDC</li> <li>• 110,469.41024 Polygon (MATIC)</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 80</b>	<ul style="list-style-type: none"> <li>• 131.04276213 BTC</li> <li>• 477.837146324674 ETH</li> <li>• \$114,223.42 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 81</b>	<ul style="list-style-type: none"> <li>• \$7,636,886.42 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 82</b>	<ul style="list-style-type: none"> <li>• \$54,514,267.94</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 83</b>	<ul style="list-style-type: none"> <li>• \$1,102,926.03 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 84</b>	<ul style="list-style-type: none"> <li>• 1,621.3037456 BTC</li> <li>• \$736,589.58 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 85</b>	<ul style="list-style-type: none"> <li>• 101.86875896 BTC</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
<b>Anonymous Lender 86</b>	<ul style="list-style-type: none"> <li>• 27,529,096.38 USD</li> </ul>	<ul style="list-style-type: none"> <li>• Unsecured</li> </ul>



<b>Anonymous Lender 87</b>	<ul style="list-style-type: none"><li>• 287.58319 BTC</li><li>• 506.1854 ETH</li><li>• 923,949.95 USDC</li><li>• 2,206,120.04 USDT</li><li>• \$2,821.45 USD</li></ul>	<ul style="list-style-type: none"><li>• Unsecured</li></ul>
<b>Anonymous Lender 88</b>	<ul style="list-style-type: none"><li>• 531.37156615 BTC</li><li>• 2,559.486696978090 ETH</li><li>• \$81,903.93 USD</li></ul>	<ul style="list-style-type: none"><li>• Unsecured</li></ul>
<b>Anonymous Lender 89</b>	<ul style="list-style-type: none"><li>• 37.98993020 BTC</li></ul>	<ul style="list-style-type: none"><li>• Unsecured</li></ul>
<b>Anonymous Lender 90</b>	<ul style="list-style-type: none"><li>• 1,052,827.98 USDC</li><li>• 1,162,827.98 Gemini Dollar (GUSD)</li></ul>	<ul style="list-style-type: none"><li>• Unsecured</li></ul>

**EXHIBIT 2**

Excluded Claims

NAME	NATURE AND AMOUNT OF ASSERTED CLAIM	NATURE OF SECURITY INTERESTS, IF ANY
Anonymous Lender 1	• 47.19895355 BTC	• Unsecured
Anonymous Lender 11	• 511.363795231678 BTC	• Unsecured
Anonymous Lender 44	• 101.1268 BTC	• Unsecured
Anonymous Lender 53	• 154.9162 BTC • 1,143,239.77 USDC • 1,828.8489 ETH	• Unsecured
Anonymous Lender 54	• 507.7147 BTC • \$15,812,927.50 USD	• Unsecured